



Response of Chevron U.S.A. Inc.

EPA's investigation of the Metro Container Site has revealed the presence of hazardous substances including, but not limited to, volatile organic compounds such as benzene, tetrachloroethylene, toluene, and trichloroethylene; polycyclic aromatic hydrocarbons such as anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(a)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, and chrysene; PCBs such as Aroclor-1248, Aroclor-1254, and Aroclor-1260; and metals such as antimony, arsenic, cadmium, lead, mercury, nickel, thallium, and zinc.

1. EPA has information which indicates that you sent drums to the Metro Container Site between 1980-1988 from one or more of your facilities. For each such facility, identify:
 - a) the address of the facility; and
 - b) the products/materials produced at such facility between 1980-1988.

Response: Gulf Oil Corporation operated a refinery at 30th and Penrose in Philadelphia, PA. This facility sent drums to Metro Container. In 1985 Gulf merged with Chevron U.S.A. Inc. and Chevron continued to operate that refinery until 1994 when it was sold.

In response to an information request in 1989 Chevron previously provided a list to EPA of products produced at the refinery. That response and list are included on the enclosed disk labeled Chevron May 10, 1989 Response to Request for Information.

2. Identify the processes used between 1980-1988 to produce the products/materials identified in response to Question #1.

Response: See enclosed document and diagram marked CHV000002 and CHV000003 which describe the operation of the refinery. These documents were Bates labeled for production in unrelated litigation involving the refinery.

3. Identify the raw materials used in the processes identified in response to Question #2.

Response: See CHV000002 and CHV000003.

4. Identify all wastes and by-products generated between 1980-1988 from the processes identified in response to Question #2.

Response: Gulf responded to the "Eckhardt Survey" in 1979 for the Philadelphia refinery. That response was also produced in the unrelated litigation referenced above. It is enclosed and marked CHV000079 through CHV000089.

5. For each raw material and waste/by-product identified in response to Questions #3 and #4:

- a) Identify the chemical composition.
- b) Provide a copy of all documents referring to or related to the composition of such raw material and waste/by-product including, but not limited to, chemical analyses performed on such raw materials and wastes/by-products; and
- c) Identify how each waste/by-product was disposed of between 1980 and 1988.

Response: Other than CHV000079 through CHV000089 we have not identified any information responsive to this request.

6. Identify all chemicals/constituents that would have been present in drums present at any time between 1980-1988 at the facilities identified in response to Question #1(a).

Response: The May 1989 response (on the enclosed disk) and its exhibits describe the chemical composition of products produced at the refinery.

7. Identify the number of drums/containers sent to the Metro Container Site from the facilities identified in response to Question #1.

Response: 201,132

8. Identify, and provide a copy of, all contracts and agreements between you and Metro Container Corporation or any related entity under which drums were sent from your facilities to the Metro Container Site (your answer need not identify documents evidencing individual shipments of drums to the Site).

Response: Chevron also responded to an information request in 1988. With that response was included the contacts and correspondence with Metro Container. Another copy of is enclosed.

9. Identify the procedures used to determine which drums present at any time at your facilities would be sent to the Metro Container Site.

Response: No information responsive to this request has been identified.

10. Identify the chemicals/constituents contained in the drums you sent to the Metro Container Site.

Response: No information responsive to this request has been identified.

11. If you assert in response to Question #9 that some or all of the drums sent to the Metro Container Site were empty, identify the chemicals/constituents that would have been in the drums before they were emptied.

Response: No information responsive to this request has been identified.

12. Provide the name, title, address, and telephone number of the person answering these questions on your behalf. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers.

Response: This response was prepared by Richard T. Hughes, Senior Counsel, Chevron U.S.A. Inc., 1400 Smith Street, Houston, Texas 77002, 713 372 9267. Persons consulted were: Kelly Avery, Legal Analyst, Chevron U.S.A. Inc.; Mehagan Hopkins, Environmental Project Manager, Chevron Environmental Management Company; and Carl Everett, Outside Counsel, Saul Ewing. Ms. Avery, Ms. Hopkins, and Mr. Everett can be contacted through Mr. Hughes.

13. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a) Your document retention policy;
- b) A description of how the records were/are destroyed (burned, archived, trashed, etc.);
- c) The approximate date of destruction;
- d) A description of information that would have been contained in the documents; and,
- e) The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response: We have not identified responsive documents that are no longer available.

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information that you provide in a response to this request should include the party's name, address, type of business, and the reasons why you believe that the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response: No information responsive to this request has been identified.